

# Send in FINAL NOTIFICATION for NESHAP 6H PAINT RULE

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The Paint Rule impacts automotive body shop painting operations that use paint that contain Hazardous Air Pollutants (HAPs). This rule will not regulate hobbyists or facilities using paints that do not contain the listed HAPs. Notification of full compliance status is due by March 11, 2011. The journey begins with these two steps:

## **Step 1: Compliance**

At this point, all collision repair facilities should be in compliance with the NESHAP 6H Rule and verified that your auto body shop has the appropriate state air quality permit in place. This permit is generally required to conduct a paint operation and emit air pollution in any given state. It is usually obtained at the start of operation, or at such time that the shop becomes aware an air permit is required in its state.

**Action Item: Verify or obtain the appropriate state air permit for auto body painting in your state.**

## **Step 2: Final Notification Form to Governing Agency by March 11, 2011**

Shops subject to the requirements of the Paint Rule must make FINAL NOTIFICATION to the local governing agency or regional EPA by March 11, 2011.

Some Final Notification Forms are available by state and are to be completed and submitted to the applicable agency *or agencies* by the deadline. (Some states require the form to be submitted to the state Air Quality Division and the Regional EPA Office.) Many states did NOT accept NESHAP authority, so Final Notification forms should be sent to the regional EPA office. See State Delegation List at: <http://www.epa.gov/collisionrepair/pdfs/statedelegations.pdf>

The **CCAR-GreenLink**<sup>®</sup> "Paint Rule" webpage has articles about the compliance process available for download. Those articles include training material for gun set up and spray techniques training as required by the rule. In-house training CAN be conducted. The shop CAN issue certificate to its own painters. The [EPA Collision Repair Campaign website](#) has a sample certificate. This process culminates with the Final Notification due March 11, 2011, after having met all requirements.

The EPA Example notification form can be found at the EPA website: [http://www.epa.gov/collisionrepair/pdfs/6h\\_compliance\\_ex.pdf](http://www.epa.gov/collisionrepair/pdfs/6h_compliance_ex.pdf)

Check the CCAR-GreenLink "Paint Rule" page for more information. <http://www.ccar-greenlink.org/paintrule.html>

**Action Item: Make Final Notification to the applicable agency by March 11, 2011.**

## **Paint Rule Overview**

On January 9, 2008, the US EPA issued the final rule for 40CFR63 Subpart HHHHHH of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources. The purpose of the **Paint Rule** is to reduce emissions of lead, nickel, cadmium, chromium and manganese. These chemicals are designated hazardous air pollutants (HAP) known or suspected to cause cancer and other adverse health effects and can be found in paint used in the automotive refinishing industry.

The rule only applies if coatings contain targeted HAPs:

- Lead (Pb), (> 0.1 percent)
- Manganese (Mn), (> 1.0 percent)
- Nickel (Ni), (> 0.1 percent)
- Cadmium (Cd), (> 0.1 percent)
- Chromium (Cr), (> 0.1 percent)

The Paint Rule impacts many facets of a regulated facility, including where painting takes place, the filters used, the paint guns that are used, how paint guns are cleaned, and the training of painters. The rule requires all spray-applied painting to be conducted in a paint booth. Spray-applied painting outside of a paint booth will be prohibited. This may impact how a company moves product through its facility. All exhaust filters used in the paint booths will have to be at least 98% efficient and will be required to have documentation that they meet this efficiency.

All coatings will be required to be applied using the following approved paint gun technologies:

- High volume, low pressure (HVLP)
- Electrostatic
- Airless
- Air-assisted airless

If a facility wishes to use another technology, it must be approved by the Administrator. More information on the new rule is available at <http://www.epa.gov/collisionrepair>.

Paint guns are required to be cleaned by hand or in a fully-enclosed gun washing machine. Atomizing solvent through the paint gun for cleaning purposes is no longer allowed, unless it is in a fully-enclosed gun washing machine.

The one requirement that may have the most long-term impact is that all painters are required to go through a specific training program every five years. This training must cover:

- Spray gun equipment selection, set up, and operation
- Best spray technique to improve transfer efficiency and minimize overspray
- Routine booth and filter maintenance, filter selection and installation
- Compliance with the rule

For a facility to be in compliance, it must meet all these requirements and must document compliance with training records, filter and paint gun documentation, and copies of regulatory reports. Existing facilities will be required to complete final notification of compliance status by March 11, 2011. New facilities are required to complete an initial notification form and a notification of compliance status within 180 days after startup.

### **For More Information**

Go to:

[\*\*EPA Collision Repair Campaign web site\*\*](#)

[\*\*CCAR-GreenLink "Paint Rule" page\*\*](#)

Code Citation: 40CFR63 Subpart HHHHHH of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for [\*\*Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources.\*\*](#)

E-mail your questions to: [paintrule@ccar-greenlink.org](mailto:paintrule@ccar-greenlink.org)